

**NEW COLLEGE OF FLORIDA
REGULATIONS MANUAL**

CHAPTER 4 - Academic Affairs

4-6302 Administration of Subcontracts and Subagreements

- (1) This regulation provides direction for ensuring the appropriate administration of sponsored research subagreements at New College of Florida.
- (2) Grants and contracts received by principal investigators and awarded to NCF to conduct sponsored research may include components of work to be performed by collaborating investigators at separate institutions. When this occurs, a third-party sponsored research subagreement is required and shall include:
 - (a) An executed subagreement between the concerned parties and,
 - (b) A purchase order issued by the College system to the subrecipient.
- (3) Subagreements are used to convey both grant (financial assistance) and contract (procurements) funding received by NCF from federal, state, industry and private sources.
- (4) This regulation is intended to:
 - (a) ensure consistency between policy and practice;
 - (b) articulate areas of responsibility for the Office of Research Programs and Services (ORPS), the Business Office (department responsible for sponsored research financial management), principal investigators and divisions and
 - (c) to identify monitoring and audit requirements for subrecipients.
- (5) Where execution of a subagreement is required or deemed advisable, ORPS will produce, negotiate, and execute a cost reimbursable or deliverable-based subagreement that ensures the technical requirements of the prime agreement are met.
- (6) Subrecipient cost and pricing documentation will be maintained by ORPS and approved by the principal investigator.
- (7) ORPS will request from those subrecipients, covered under OMB A-133, a copy of the most recent audit as required by A-133. Non-A-133 subrecipients will provide a copy of their most recent independent audit for review.
- (8) The Business Office at the College will review the audit reports and take appropriate follow-up steps as required based on any relevant audit findings.
- (9) ORPS will coordinate the acceptability of payment and billing terms and procedures with the Business Office. Payment and billing terms will generally follow the payment and billing terms of the prime sponsor.
- (10) ORPS will also secure the approval of the principal investigator for the subagreement document. When appropriate, sponsor terms and conditions regarding rebudgeting will apply to the subagreement.

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- (11) Subagreement templates will be reviewed by NCF's general counsel to ensure that the terms and conditions are consistent with applicable laws and regulations. The general counsel will approve or modify subagreement templates to legally acceptable language, coordinating such changes with ORPS.
- (12) ORPS will coordinate additional reviews with appropriate units when the subagreement contains non-standard language that may be in conflict with NCF or federal regulations.
- (13) ORPS will secure the appropriate signatures of the subrecipient and will execute or cause to be executed the subagreement on behalf of NCF, under authority delegated by the NCF president.
- (14) ORPS will transmit one copy of a fully executed original to the subrecipient. One copy of the subagreement will be sent to the principal investigator, and one copy to the Business Office.
- (15) ORPS, in concert with the principal investigator will initiate a purchase requisition to the Purchasing Office with the subagreement document attached to and made a part of the purchase order which will be issued to ensure that funds are properly available in the subagreement and that said funds are properly encumbered and dedicated to the purpose of this procurement.
- (16) The principal investigator will be responsible for monitoring and ensuring the technical performance of the subrecipient and will certify to this performance prior to the payment of any invoices by the Business Office. ORPS will retain the supporting documentation for the subrecipient's performance.
- (17) Invoices for payment to subrecipients will be submitted by the principal investigator or the Division to ORPS for compliance review and then ORPS will process and forward required documentation to the Business Office at New College referencing the purchase order and subagreement under which the remittance is to be made. The subrecipient's services must be received prior to payment processing. The invoice will be signed by a subrecipient employee who is knowledgeable and authorized to do so, such signature attesting to the accuracy of the invoice and that the deliverables or expenditures for which reimbursement is sought are in accordance with the subagreement and were made solely for the performance of the subagreement.
- (18) Documentation required for invoicing is outlined below.
 - (a) For all Florida agencies and subdivisions as defined in Chapter 768.28, Florida Statutes: Subrecipients must submit an itemized invoice using the same cost/deliverable categories that appear in the approved and executed subcontract budget. The State of Florida regulates general administrative and audit standards for state agencies and the State University System institutions; therefore, supporting documents for cost reimbursable subagreements do not have to be submitted to the College. Rather, receipts and other documentation in support of itemized invoices must be maintained in the subrecipient's records as they are subject to inspection by State of Florida officials.
 - (b) For all other subrecipients:

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1. Subrecipients with cost reimbursable subagreements must submit an itemized invoice using the same cost categories that appear in the approved and executed subagreement budget.
 2. Subrecipients with cost reimbursable subagreements must maintain detailed documentation in support of the expenditures and deliverables shown in the invoice.
 3. Subrecipients with deliverable-based subagreements will not be required to provide cost documentation. Subrecipients with acceptable audits will maintain receipts and other documentation in support of itemized invoices in their records and are subject to inspection/review by New College of Florida officials upon request.
- (19) The principal investigator will examine the invoice and may request additional documentation to determine that charges are consistent with work performed and are in accordance with the prime agreement terms and conditions.

Authority: Article IX, Sec. 7, Fla. Constitution; Fla. Board of Governors Regulation 1.001

History: Adopted 04-27-02, as Policy 0-302; Revised and renumbered 05-15-10, 06-29-10; Revised 03-11-17 (technical amendment)